

Exhibit 1

Additional Parties

Here

5. Mr. Metellus Ward, 6. Ms. Reed Warden,
7. Capt. Nottingham, 8. LT. Mazzocchi, 9. Frank Bochenek,
10. Dan Onizek, 11. Mr. DiSandro - (9, 10, 11 are the investigators)
12. Coyne ass. Director - Address for all 1730 S. Eastern Rd, Doylestown, Pa. 18901

Prison Oversight Board: 13. Robert Harvie Jr.,
14. Diane M. Ellis-Marsegia, 15. Gene DiGirolamo, 16. Judge
Wallace Bateman, 17. DA. Matt Weintraub, 18. Milt Warrell,
19. Ann Russavage-Faust, 20. Christine Shenk, 21. Karen
Dopson, 22. Daniel Grace, 23. Sara Webster.

24. BCCF Primercare medical dept. and mental
Health dept, ²⁵ Et al and Bucks County.

All in their individual and official capacity

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Exhibit 2

Facts Underlying Claims

Procedural History

On January 26, 2017, the Court entered an order vacating the conviction and sentence of the Plaintiff in this matter. Alfonso Sanchez ("Sanchez") in CP-09-CR-1136-2008. A new trial was ordered and shortly thereafter, Sanchez was transferred back to Bucks County Correctional Facility (BCCF) to await a new trial. Following Plaintiff's exoneration, on December 13, 2018 Sanchez filed a lawsuit (See article attached as Exhibit 2A pg. 7) against Bucks County, Warminster Township and their investigators alleging "they fabricated evidence, and intentionally withheld and misrepresented exculpatory evidence, specifically DNA results" Exhibit 2A. The lawsuit is assigned to Hon. Judge Cynthia M. Rufe, in this Court (Docket 2:8-CV-05381 CMR)¹ and will remain pending until Sanchez's new trial has been completed and appellate double jeopardy claims are completely litigated. The purpose of including this procedural history is because as stated herein, Plaintiff believes a connection exists between his lawsuit and some of the actions taken by the Defendants in this matter in placing Sanchez in administrative seg. for punitive purposes for an indefinite period without any process or chance to respond.

FN1 Plaintiff intends to file a motion requesting this lawsuit be assigned to Judge Rufe as a related case.

Sanchez alleges the defendants violated his constitutional rights by placing him in admin seg. for punitive purposes without proper process, causing damages, Sanchez seeks the relief stated herein

Facts

On or about November 5, 2020, Sanchez was placed in administrative segregation without notice of a reason or an opportunity to respond. (This happened numerous of times as outlined in grievance dated 11-17-20 (page 29) it highlights everytime Mr. Sanchez was moved around as a retaliatory tactics.) Sanchez directed numerous requests to BCCF officials requesting an opportunity to respond to the determination to place Mr. Sanchez on admin seg. for an indefinite period of time (Exhibit 2B, page 10 attached hereto).² The BCCF Request slips attached also demonstrate Sanchez's numerous requests regarding his status.

FN 2 The content of the requests, individually and as a whole, are incorporated by reference. Where necessary individual request known as BCCF Green slips are referred to by date

Although Mr. Sanchez disagrees with the process and determination by BCCF administrators to place him on admin seg, the Bucks County DA ("The DA") filed two new cases against Mr. Sanchez alleging offenses at BCCF. Despite the new allegations and original 2008 charges against Mr. Sanchez, all parties agree that "the Department of Corrections has determined that the Plaintiff Mr. Sanchez does not pose a present danger to the institution and has placed him into general population." See Commonwealth's Emergency Motion to Modify Bail and Impose New Bail Conditions, ("Emergency motion"), Para. 6 attached hereto as Exhibit 2C, page 47. The determination by BCCF that "Sanchez does not pose a present danger" was made on July 2, 2021 with full awareness of all the allegations against Mr. Sanchez and considered his conduct in the institution. Consequently, Mr. Sanchez was moved from admin seg to general population.

While in admin seg from Nov. 2020 until July 2, 2021, Mr. Sanchez wrote a request slips to BCCF administration, including deputy warden Ms. Reed and other staff regarding his status in admin seg, the BCCF investigator's (Bochenek, Onizek & Disandro) suggested to Sanchez that his status in admin seg could be changed if Sanchez dropped his pending lawsuit.

In general population, Mr. Sanchez had a job and complete access to the physical and mental health services which are limited in admin seg.

Despite the determination by BCCF to move Mr. Sanchez to general population, the Bucks County DA (Matthew Weintraub, esq., Matthew Lanetti, esq. and ADA Edward Furmas) did not wait even one day to file the emergency motion Exhibit C which sought to interfere with BCCF administrator and decision making regarding Sanchez's housing status. The DA made this request knowing it creates a "fiction" Exhibit C, Para 12 and acknowledging the Court cannot specifically order Mr. Sanchez to be placed in admin seg. The Court held a hearing on the DA's emergency motion and rejected the DA's attempts to interfere with decision making by BCCF administrator.

Although the Court's decision allowed Mr. Sanchez to remain in "gen pop", the inflammatory language in the "emergency motion" demonstrated the depth of the DA's anger at the BCCF's decision and their desire to impose as much punishment as possible on Mr. Sanchez in retaliation for his lawsuit and exposure of the improper conduct of county officials in his 2008 case.

On or about July 26, 2021, the BCCF returned Mr. Sanchez to administrative Segregation where he currently remains. As demonstrated by an August 30, 2021 letter (Attached as Exhibit 2D), Mr. Sanchez return to admin seg represented impermissible punishment for a minor misconduct allegation. We believe the evidence (through discovery) will show the decision to return Mr. Sanchez to admin seg was made for retaliatory purposes to fulfill the intent expressed in the DA's "emergency motion". Mr. Sanchez was initially placed on both restricted housing and admin seg but the restricted status ended 37 days. Additionally, Again Sanchez was NOT provided with notice of his placement in admin seg or given any chance to respond. Bucks County has NO formal process in the inmate manual regarding placement of inmates on administrative lock status. Mr. Sanchez remains in admin seg for an undefined period. The prison Oversight Board has admitted he was returned to admin seg because of a misconduct allegation. He has no ability to challenge the admin seg designation. Additionally, for the entirety of Mr. Sanchez's time in admin seg he has not been allowed to contact his attorney's via phone³ to participate in his own defense even though the DA seeks to impose the death penalty. Moreover, Mr. Sanchez has been treated differently than similarly situated inmates whom are not indefinitely kept on admin seg.

Question IV part D Supplement
Supplementary Relevant Facts

- 1) BCCF investigators have attempted to unduly prejudice other inmates to participate in their investigations by referring to Mr. Sanchez as being "guilty" about his opened cases and giving them details of those cases, and that Mr. Sanchez is a "evil person" "master manipulator" who manipulates "women", "guards" and "inmates" and that Mr. Sanchez is a killer. This is slander & defamation of Character.
- 2) At the current time, Mr. Sanchez has not been convicted of any alleged offenses he has been charged with.
- 3) Even before Nov. 2020, BCCF has placed Mr. Sanchez in admin seg numerous times as retaliation without notice or an opportunity to respond, the investigators said they can do what they want and can keep Mr. Sanchez locked for as long as they want cause there is no policy.
- 4) The exhibits to Question VII include Mr. Sanchez's summaries and submissions as part of the grievance process document the manner in which the treatment of Sanchez has differed from similarly situated inmates.

Exhibit 2A

Lawsuit vs. Bucks County
2018



pennrecord.com/stories/511687289-e



PENNSYLVANIA RECORD



Home » Stories » 2018 » December

Exonerated death row inmate alleges Bucks County and Warminster police engaged in wrongful prosecution

LAWSUITS

By Bree Gonzales | Dec 27, 2018



shutterstock.com

PHILADELPHIA — A Pennsylvania resident is suing police in Bucks County and Warminster Township, alleging that they fabricated evidence and intentionally withheld and misrepresented exculpatory evidence, specifically DNA results.

Defendants in Alfonso Sanchez's Dec. 13 lawsuit are Bucks County, Warminster

124
SHARES



PENNSYLVANIA RECORD



PHILADELPHIA — A Pennsylvania resident is suing police in Bucks County and Warminster Township, alleging that they fabricated evidence and intentionally withheld and misrepresented exculpatory evidence, specifically DNA results.

Defendants in Alfonso Sanchez's Dec. 13 lawsuit are Bucks County, Warminster Township, Warminster Township Police Officer Sean Harold, Bucks County Detective Martin McDonough and Warminster Township Detective John Bonagro.

The suit, filed in Philadelphia federal court, alleges malicious prosecution, and deprivation of liberty without due process of law and denial of a fair trial by fabricating evidence, withholding exculpatory material and impeachment evidence, and deliberately failing to conduct a constitutionally adequate investigation, and other counts.

According to the complaint, the plaintiff alleges that in 2008, he was wrongfully

124
SHARES



PENNSYLVANIA RECORD



According to the complaint, the plaintiff alleges that in 2008, he was wrongfully convicted of murder in the first degree of the shooting deaths of Mendez Thomas and Lisa Diaz and, as a result, served nine years on death row before his conviction was vacated and another one-and-a-half years in county jail while he awaited retrial.

The defendants allegedly performed their unlawful acts under the color of state law, intentionally, with reckless disregard for the truth, and with deliberate indifference to Sanchez's rights.

The plaintiff requests a trial by jury and seeks compensatory damages, punitive damages, costs, attorney's fees, and for any and all other relief to which he may be entitled. He is represented by Michael Pillegi in Philadelphia.

The U.S. District Court for the Eastern District of Pennsylvania Case No. is 2:18-cv-05381-CMR.



Want to get notified whenever we write about any of these organizations ?



B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

11/11/20

Module and Cell Number

R HU 9

Admission Date

I would like to see

Ms. Reed

I need to see that staff person because

Why am I being put under investigation again when I am not a threat to this institution or my self, because now I'm in a hard cell since Thursday and no-one came to see would you please get me out the hole.



Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

Status will be reviewed once investigation has been concluded.

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

MS. Reed

Sanchez RHU-9

MS. Reed

Exhibit 2 B

BCCF'S

Request Slips

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sánchez Alfonso

Date

11-28-20

Module and Cell Number

RHU 9

Admission Date

I would like to see MS. Reed.

I need to see that staff person because I have been in the RHU for about 30 days as of now; under RHU status house alone without a misconduct. No one is telling me anything. Would you please find out what's going on and how much longer I have to stay down here without a misconduct.

Also I filed a grievance, however, I still have yet to get a response, I wrote it on or about 11-17-20.

Thank You!

Alfonso Sanchez
Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer: Grievances will be answered w/in 10 days of Receipt. I would assume you should be getting a response shortly. Please direct inquiry to Michelle at the Admin Building if you do not receive response w/in a few days.

Referral Sent To:

Return To: 171 follow up re: KITU status Module & Cell #

Signature of Staff Person

Investigation still pending.

Mrs. Reed

Mrs. Reed

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Abner

Date

1-7-21

Module and Cell Number

D-12

Admission Date

I would like to see MS. Reed,

I need to see that staff person because Happy New Year! I am writing you again about me being locked down under PHA status without a misconduct. You & I as well as all staff who worked around me can vouch that I don't cause trouble in this facility. I've seen so many people (inmates) get caught with drugs, have weapons and assaultive behavior towards staff & inmates and they only get 30 days hole time, even while I didn't do anything wrong and it's been over 2 months. I've been in the hole without a misconduct. Do you think this is fair? would you please help me and do something about this.

Thank You!

Abner Sanchez
Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

I actually inquired yesterday about your status. Will advise when I have an update.

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

Mrs. Reed

Mrs. Reed

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Banchue A.

Date

1-14-21

Module and Cell Number

MHU 5

Admission Date

I would like to see Mr. Siani

I need to see that staff person because I was moved from RHU to D block on admin lock now I got moved to MHU put on RHU status, would you please have my status fixed back to admin lock cause I do not have a misconduct I'm only under investigation and it's been over 2 months now.

Thank You!

A. Sanchez

Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer: It was an Administrative decision to place you on RHU status. You will need to ask the Warden (Galione) about this.

Referral Sent To: _____

Return To: _____

Module & Cell # _____

Signature of Staff Person W. Siani

Siani

Siani

S-W

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Albino

Date

1-15-21

Module and Cell Number

~~MH 5~~ G-20

Admission Date

I would like to see

matities

I need to see that staff person because

I have been on RHE status for almost 3 months now without a misconduct under investigation, if I'm going to be left under investigation would you at least change my classification to admin. I have never caused a problem in this facility and I've been here going on 4 years. I've seen numerous people get caught with drugs and have assaultive behavior towards inmates. I still see inmates being found with weapons, to which all get a misconduct with 30 days hole time. Meanwhile I'm under RHE status without a misconduct. How is this fair?

Albino Sanchez

Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer: Until we are notified that the investigation is complete, you will remain on the status.

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

Cup

~~Matthes, D.C.~~

~~Matthes, D.C.~~

G 20
Sander

20-309-18

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

1-27-21

Module and Cell Number

G-20

Admission Date

I would like to see

Frank Bochunek Investigators.

I need to see that staff person because

I would like to know why you continue to violate my Rights under the 1st, 4th, 5th, 8th & 14th amendments of U.S. Constitution, when I know for a fact that there has been numerous inmates who have been found with drugs & bringing in as well as being charged with it and only getting 30 days hole time and went back out to population, mean while I'm still in the hole? This is Deliberate Indifference. Also what are the names of your Superiors?

Thank You

Alfonso Sanchez
Signature of Inmate

Do Not Write Below This Line

Date request answered:

02-04-2021

Answer:

REFER TO YOUR GREEN SLIP DATED 01-18-2021, I REPORT TO DIRECTOR PIROLI, ON 01-18-2021 YOU WERE INFORMED OF THE REASON YOU ARE ON LOCKED/PHU STATUS.

Referral Sent To:

Return To:

INMATE SANCHEZ

Module & Cell #

Signature of Staff Person

Frank Bochunek

Special Investigator

~~Frank Bochenek~~
~~Investigator~~

~~Frank Bochenek~~
~~Investigator~~

INMATE ALFONSO SANCHEZ #095098

G-20

B.C.P. Number

20-309-18

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

2-3-21

Module and Cell Number

G-20

Admission Date

I would like to see

Frank Bochenek Investigator

I need to see that staff person because

I would like to know why you continue to violate my rights under 1st, 4th, 5th, 8th & 14th Amendments of the U.S. Constitution when I know for a fact that there has been numerous inmates who have been found with drugs & bringing them in as well as being charged with it and they only get 30 days hole time and went back out to population, mean while I'm still in the hole without charges or misconduct? ~~There are no more inmates who have been found with drugs & bringing them in as well as being charged with it and they only get 30 days hole time and went back out to population, mean while I'm still in the hole without charges or misconduct?~~

Also what is the names of your Superiors?

Thank You!

Alfonso Sanchez
Signature of Inmate

Do Not Write Below This Line

Date request answered:

02/11/21

Answer:

FRANK BOCHENEK IS OFFICIALLY RETIRED. AS YOU WERE PREVIOUSLY TOLD, CHARGES ARE FORTHCOMING. THE INVESTIGATION UNIT ANSWERS TO THE DIRECTOR, CHRIS PIROLI. MR. PIROLI IS AWARE OF YOUR COMPLAINTS AS IS THE BUCKS COUNTY DA'S OFFICE.

Referral Sent To:

Return To:

SANCHEZ, A. #095098

Module & Cell #

G20

Signature of Staff Person

INVESTIGATOR JANELOONICK

Investigator
Frank Bochenek

Frank Bochenek

Investigator

MEC

6-20
Sanchez, A.
#095098

Return:

2-10-21

Director Mr. Pirolli

I would like to know why your subordinates
 to continue to violate my Rights under the 1st, 4th, 5th, 8th & 14th
 Amendments of the U.S. Constitution by housing me on RHC status
 for 4 month now without a misconduct. I know for a fact because I have numerous
 names of inmates who have been found & charged with bringing
 drugs in this facility and only getting 30 days hole time & go back
 out to population. Also there are numerous inmates with
 assaultive behavior on staff & inmates and only received 30 days
 hole time. I have been on RHC status for almost 4 month now.
 How is this fair to me? when in your handbook it says everyone is to
 be treated fairly. Also would you please send me the full names of
 all your subordinates involved ^{in this matter} so I could file my civil ^{complaint} ~~action~~.

I haven't been a ~~threat~~ ^{threat} to my self or this institution.

I have exhausted all grievance procedures in this matter, and this is my last
 plea for you to rectify this cruel & unusual punishment.

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

2-28-21

Module and Cell Number

RHU 6

Admission Date

I would like to see

Ms. Reed

I need to see that staff person because

I would like to know why I'm being house on admin lock when you have inmates with the same charges as me in this prison and they are not on admin lock. You know I'm not a problem make inmate and I won't cause trouble. I just want to be treated fairly. I did 4 months on RHU status, I served my time. Also I'm still a pre-trial detainee who hasn't been convicted of any crime, it's not right to keep me locked up off of he said she said. Look at my record since I've been here, how many write ups did I get in the 4 years I have been here. Please give me a chance like everyone else. People on death row are not even locked in any more.

Thank You

Alfonso Sanchez
Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

Your status is reviewed regularly.

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

BCCF 194 REV. 10/04

Received
3-8-21

Ms. Reed

Ms. Reed

CG 21

Sanchez

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sánchez Alonzo

Date

3-9-21

Module and Cell Number

C 21

Admission Date

I would like to see

MS. Reed

I need to see that staff person because

It's been a lot of yard cancellation for RHU & Admin locks for morning yard. I spoke with block officers about going to yard on the block they said it would be easier, however, I would have to get it approved by you. Would you please approve me to have yard on the block at Line Shift.

Thank You!

Alonzo Sanchez

Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

Please let me know when yard was canceled & will look into.

Referral Sent To:

Return To:

Module & Cell #

h

Signature of Staff Person

MB. Reed

MB. Reed

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

3-16-21

Module and Cell Number

C-21

Admission Date

I would like to see

Ms. Reed

I need to see that staff person because

I'm requesting respectfully an on record deposition as to why I'm still on admin lock.

I'm also requesting respectfully if you could approve me to go to yard on the block because its always a problem with going to yard in B1K due to it always being canceled or they are coming at 6:30am before I even have breakfast. It would just be a lot easier on the guards and at least I know I would get my yard time without any problems.

Thank You!

Alfonso Sanchez

Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

Yard status is due to be renewed on/around 3/26/21.

Referral Sent To:

When was yard canceled?

Return To:

Module & Cell #

Signature of Staff Person

MS. Reed

MS. Reed

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Albino

Date

4-1-21

Module and Cell Number

C 21

Admission Date

I would like to see

MB. Reed

I need to see that staff person because

could you please write me back as to why I'm still on admin lock.

Also could you please let me know who and what does the admin team comprise of.

Thank You!

Albino Sanchez

Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

You are on administrative lock for the safety and security of the institution at this time. Your status will continue to be reviewed regularly and when deemed appropriate your lock status will be removed.

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

Ms. Reed

G-21
Sánchez

Ms. Reed

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

4-8-21

Module and Cell Number

G-21

Admission Date

I would like to see

MB Reed

I need to see that staff person because

I wrote about why I'm on admin lock still and I got a vague response that was not your signature, it said I was locked for the safety and security of the institution. Respectfully, I would like to know the reasons as to how or why I'm admin locked under them pretentious claims.

Thank You!

Alfonso Sanchez

Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

No further explanation will be provided at this time. Your status will be reviewed regularly

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

BCCF 194 REV. 10/04

MS. Reed

Sanchez G-21

MS. Reed

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sánchez Alfonso

Date

5-13-21

Module and Cell Number

G-21

Admission Date

I would like to see

MS. Reed

I need to see that staff person because

Thanks for coming by to talk to me. I have a few questions, (1) what should I do about the rest of my stuff I'm missing? (2) Have you spoke to anyone about the GED program. (3) would you please help me get my link units put on my trust fund account since I can't use the messaging system.

Thank You!

Alfonso Sanchez

Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

waiting to hear back from

VITA re: school & then I will need

Referral Sent To:

to follow up w/ my administration.

Return To:

Module & Cell #

Signature of Staff Person

I spoke to the Captain re: property & they will take another look!

129 22/2/21
Gundlach 621

M.B. Reed

M.B. Reed

INMATE REQUEST FORM

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

5-31-21

Module and Cell Number

G-21

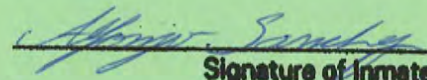
Admission Date

I would like to see

MB Reed

I need to see that staff person because

I filled a grievance to the Director and I never received a response, grievance # was 2021-48. I still haven't heard anything about my property. Also about the situation with getting my money from my link can't get put back on to my trust fund account.



Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

I have reached out & have to have an answer for you. From my understanding some of your items have been replaced in place of missing items?

Referral Sent To:

Return To:

Signature of Staff Person

The last updated list I received had paper up & I know that has been replaced as well.

Mrs. Reed

Mrs. Reed

G20
Sanchez

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

7-26-21

Module and Cell Number

G-3

Admission Date

I would like to see MS. Reed

I need to see that staff person because

I would like to know why I am back on admin lock RHC status, also what going with my grievance I filed # 2021-48, I never received the response from the director's office. And would you please send me 2 grievance forms because I'm still being denied medical treatment for my broken toe. Thank You!

Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer: RHC pending investigation.

when I receive additional information, I will come speak to you.

Referral Sent To:

Return To:

I'll follow up on pending grievance & you can provide you grievance

Signature of Staff Person

forms for the medical complaint

BCCF 194 REV. 10/04

G3

MS. Reed

MS. Reed

Request Slip
~~XXXXXXXXXXXX~~ 8-8-21 metilus/Kratz

I was told I'm under investigation for using ~~the~~ ^{other} inmates phone, however, I still have not received a misconduct. Also how is it fair to me when other ~~people~~ ^{inmates} have stealing ~~from~~ ^{inmates} accounts, other inmates are not allowed to use phones & still do, however, none of them get put on admin lock under investigation they just get a misconduct and I know numerous names of inmates this had happened to. So why am I being treated differently? Also is this gonna be an on going thing were every infraction I commit I gotta get put under investigation and put on admin lock? I feel like this is a clear abuse of authority by your investigation team, and I would like to know if your cosigning their actions

Monica,

I am writing you because I was placed in the RMC about 8 days ago for no reason at all and no one is telling me anything, I haven't even spoken to my family, I have only been getting 5 to 10 min sleep burst throughout the day & night and a total of maybe an hour and a half because people keep screaming & banging all day & night. I don't want medication because I don't do drugs but this is stressing me out and giving me bad anxiety, I'm starting to not understand what's real or not I'm seeing and hearing voices, and no I don't want to hurt myself or any others, I just want to know why I'm back here and if you could have me moved to a different block for mental health reasons - mental health came to see me on 11-13-20 and said they could not help me, but she could put me naked in a cell.

I want to speak to all 3 investigators they refused to tell me why I'm in the hole and said "they can do what they want and they are going to break me," this was today 11-13-20, and told me to drop the lawsuit.

Today 11-13-20 on or about 3:12 pm Mr. Lagana walked by my cell I asked him why I'm back here he said "Kill your self" and walked off.

Request Slip - 2nd slip 12-4-20

To: Monica, mental H-ealth

From: Alfonso Sanchez 095098 RHU 9

Request: I'm still having problems going to sleep, I'm having severe concentration & memory problems, severe panic attacks, I'm stressed out, my anxiety & tension is high. I can't even read a book without the words moving around or I forget what I read as I'm reading, I'm even having problems eating my food. I have been harming my self, hearing voices and frequencies, I'm having problems not knowing what's real or fake, Please come see me I need help I'm losing my self, I need to know how to fix this.

11-17-20

Grievance:

Chronicles: Sometime in 2018 I asked the warden a question about the showers and the way we clean the curtains. Then he left ~~the~~ B-module and no matter within 2 min. I was told to pack up because the warden Mr. Lagana had moved me to G-module, I stayed on G-module for about 7 month then I was told to pack up cause the warden wanted me on A module, then I was moved again ^{by the warden} within 2 month to B-module, then I was to move to the RHC because I'm being put under investigation ^{by the warden,} no one told me why and they didn't know no matter who I asked. Then I got moved to C-module stayed there for about 2 month then again I got put under investigation still no clear answers as to why. Then I got moved back to B-module ^{as of 11-5-20} and now I'm under investigation ^{again} and still no one tells me anything as to why. Now I'm placed on house alone with no phone calls, I'm being denied my legal work my address book was taken by investigators and it still has not been returned it has all my lawyer's info as well as family & friends. I have never been violent to staff nor prisoner's and always remained respectful towards all staff & prisoner's. So why am I always being treated unfairly? I'm housed around mentally ill inmates who scream & Bang day in day out, I'm in a cell with Feces on wall and stuck to toilet bowl. Being denied Razor & nail clipper's. This is a clear violation of my ^{1st} ~~1st~~, 8th and 14th Amendment Rights, subjecting me to cruel & unusual punishment because this is physical & mental abuse. Also my legal mail still keeps being opened without my present because again it was opened on or about 11-10-20

Detailing Informal Process to Resolve:

I wrote to Laguna, Mrs. Reed, Mr. Galizon, no reply. I spoke to SGT's Wylie, Sherman, Moreniz, LT's Clayton, Kovach and Captain Nottenham. I spoke to all 3 investigators on 11-13-20 and they wouldn't tell me anything. I also spoke to Mr. Laguna & LT Clayton on 11-13-20 on or about 3:12 pm and still no answer's as to why I'm in the RHU. I also wrote Monica from mental Health.

Specific Remedy Being Sought:

There needs to be policy put in place detailing reason's why someone could be placed under investigation and sent to the RHU. Also there needs to be policy on the duration allowed to put someone under investigation so there isn't an abuse of power. Monetary damages for injuries

12-1-20, Appellate Review, Grievance #2020-207

How is it you have inmates who been in trouble for physically & verbally assaultive towards staff, inmates and self, as well as being found to have weapons and drugs in this facility get 30 days of RHU time, mean while I've been ^{in this facility} ~~here~~ going on 4 years with none of these misconducts and being housed in RHU without a misconduct. ^{my housing is Arbitrary: illegal not appropriate.}
Also legal mail is supposed to be open in front of client this has not happened of numerous occasions. And none of my issues are properly addressed. I'm also requesting that all video, audio and computer generated time stamps of all investigation be preserved for further legal proceedings.

Arbitrary

Received on 12-10-20
poroli

and unresolved
(1)

All issues are not address, Like being moved around by the Warden & investigator's under retaliatory tactic. (2) Still being housed in RHU without^a misconduct. (3) ~~Being denied my legal property.~~
(3) Being put in a cell with Feces on the walls and stuck inside the toilet bowl. ^{and vermin running around} (4) Being denied Razors & nail clipper. (5) Being housed with mentally ill inmates who bang & scream all day & night keeping me up. (6) My address ^{book} was taken by investigators and it still was not returned to me. (7) It's been going on 45 days now still under investigation and no one was is telling me anything. (8) I only been to yard twice since being in RHU. (9) Being denied my legal property. (10) I wrote mental health twice and still no help.

Grievance 9-26-21

2 issues, 1) I have been on lock status since 7-26-21 and no one is telling me why, I didn't do anything to warrant long term isolation. 2) my phone calls & messaging privileges have been taken away for almost a year now, it was never court ordered nor apart of my misconduct sanctions. I am being punished for crimes I haven't even been convicted of, and this is making my mental health decline.

I wrote to W.B. Reid, even spoke to her & Gacione and ~~met~~^{spoke} to Matellus. And I wrote to Kratz

I would like to have my phone calls & messaging restored, and get off lock status due to my mental ^{health} declining

Request Slip

9-26-21

To: Mr. Hutt

From: Alfonso Sanchez 095098 G43

Request

would you please forward grievance
to Superintendent

Thanks!

It was forwarded.

✓



Webster Law^{P.C.}
ATTORNEY AT LAW

87 North Broad Street
Doylestown, PA 18901
215 348 7700
FAX 215 348 0171

Sara M. Webster, Esquire
swebster@websterlawpa.com

February 17, 2021

Alfonso Sanchez
Inmate No. 095098
1730 S. Easton Road
Doylestown, PA 18901

Dear Mr. Sanchez;

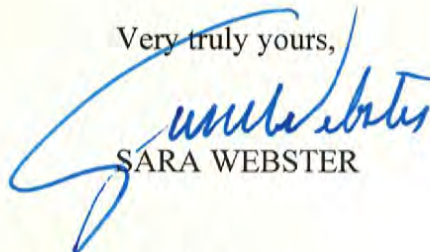
I am in receipt of your most recent letter dated 2/10/2021 complaining of the conditions of your confinement. I checked with the prison who confirmed that indeed you had been under investigation and therefore subject confinement to your cell pending investigation of activities jeopardizing the security of the institution.

I am advised that you received a shower as recently as yesterday and the previous week as well.

Yard has been cancelled for the last couple of weeks due to the accumulation of snow.

I am advised that the investigation has nearly being concluded and more information will be available to you.

Very truly yours,



SARA WEBSTER

c.c.: Christine Shenk, Chief Probation Officer via email
Grievance Committee via email
Keith Bidlingmayer via email

**BUCKS COUNTY DEPARTMENT OF CORRECTIONS
INMATE GRIEVANCE FORM**

DATE 8/11/20

NAME Alfonso Sanchez BCCF# 095098 FACILITY Bucks CELL B-33
 GRIEVANCE # 2020-137, DATE POSTED: 8/17/20, INITIALED (lu)

It is understood that all information pertaining to this grievance shall be released to the Bucks County Prison Oversight Board.

ATTACH ADDITIONAL PAGES AS NEEDED

Statement detailing the act or condition giving rise to this grievance: (Be specific, list all dates, times, locations and witnesses)

my pictures from my friends & family are being sent back on numerous occasions there is no nudity they are fully dressed so I do not know why my pictures are being sent back, other people are getting their pictures and theirs are in bathing suits.
I feel my pictures are being deliberately sent away by who ever is screening them.

Statement detailing informal process which you have attempted in order to resolve this grievance: (Attach any written documentation from staff.)

I went to our Rec & Business Office and never heard back from them.

Specific remedy being sought:

I want my pictures to not be sent back when my family & friends are following proper protocol, and there needs to be a better system for screening photo's.

Received by: _____ Date: _____

First Level Response:

Your grievance has been reviewed. Please be advised, if the pictures do not conform to the mail policy restrictions they are returned to the sender.

Answered by: [Signature] Warden Date: 8-19-2020

Appeal to Director of Corrections: If the inmate/resident is not satisfied with the outcome of the first level response, he/she may then forward a written appeal, with the previous response, to the Director. The appeal must be filed within ten (10) days of the inmate's receipt of the first level response. After a review, the Director will make resolution in writing within ten (10) days of receiving the appeal. (appeals form on back).

Appeal to the Bucks County Prison Oversight Board. If the inmate/resident is not satisfied with the outcome of the appeal to the Director, he/she may forward a written appeal with the previous responses, within ten (10) days of receipt of the Director's response, to the Bucks County Prison Oversight Board, attn: Michael J. Gallagher, Controller 55 East Court Street, Doylestown, PA, 18901. The County Prison Oversight Board shall provide the Director of Corrections with a copy of any such appeal and will forward its written decision to the inmate/resident and the Director of Corrections.

8-26-20

NOTIFICATION OF APPELLATE REVIEW BY DIRECTOR


Statement of rationale for appellate review:

my grievance is still not resolved because my mail is still missing and some are being sent back. My family & friends are conforming to the mail policies, and the pictures I'm getting sent from Textbehind are a prison friendly company that screens their own pictures being sent. So if they are approved from Textbehind then why not here? So clearly my pictures are being sent back for no reason.
I still want the same remedy sought.

Received by: _____ Date: _____

Resolution:

Inmate Sanchez, BCDOC does not contract with "Text Behind" and therefore is unaware of the criteria used. All Correspondences to BCDOC must meet the Department requirements set forth. If mailings are not compliant, items are returned. Your grievance is denied.

Answered by:  Date: September 8, 2020

NOTIFICATION OF APPELLATE REVIEW BY BUCKS COUNTY PRISON OVERSIGHT BOARD

Statement of rationale for review by Prison Oversight Board:

Received by: _____ Date: _____

Resolution by Prison Oversight Board:

Answered by: _____ Date: _____

B33
Sanchez Alfonso



Webster Law^{PC}
CRIMINAL DEFENSE

Sara M. Webster, Esquire
87 North Broad Street
Doylestown, PA 18901
swebster@websterlawpa.com

April 7, 2021

Alfonso Sanchez
Inmate No. 095098
1730 S. Easton Road
Doylestown, PA 18901

Dear Mr. Sanchez;

I received your undated letter on April 5, 2021 complaining that you are confined to lock status. Any complaints about prison conditions must be addressed first to the Warden, then to the Superintendent and finally, at the third level, to the Prison Oversight Board at which time it will be refer to someone on the Grievance Committee.

I have no authority to address your issues directly and please ask your friends and family members not to contact me either.

Very truly yours,


SARA WEBSTER

SMW/lc



Webster Law^{PC.}
ATTORNEY AT LAW

87 North Broad Street
Doylestown, PA 18901
215 348 7700
FAX 215 348 0171

Sara M. Webster, Esquire
swebster@websterlawpa.com

November 23, 2020

Alfonso Sanchez

Doylestown, PA 18901

Dear Mr. Sanchez;

I am in receipt of your letter. Enclosed please find a blank grievance form. Your grievance needs to follow the proper procedure by first filling out this form which first goes to the Warden, then Superintendent Pirolli and finally the Prison Oversight Board.

Very truly yours,


SARA WEBSTER

SMW/lc

Enclosure

Request Slip

8-9-21

From: Alonzo Sanchez #095098

To: Director Kratz

Request: I would like for you to fire your investigation team of Disandro & Dan O. for their egregious misconduct and unprofessional conduct for ~~the~~ Defamation of Character and Slandering my name by saying I'm "evil" and I "manipulate everyone" and that I "shot a murdered people" and telling this to numerous inmates and talking about my case. Also trying to coerce inmates to make false accusations against me. These inmates will be later identified in later court proceedings to protect them from retaliation.

CC

Grievance # 2021-48

4-16-21

I've been on lock status since 11-5-20 and was told by the administration that I'm to be locked until further notice for the "safety and security of the institution".

This pretentious claim falls on its face. I have been in this facility for 4 years and never harmed anyone and no one has harmed me. Numerous inmates have received the same charges as me and they never get put on admin lock, also there are numerous inmates with assaultive behavior and are not locked, there was numerous inmates who have been found with bringing drugs in this facility and they are not on locked status. I am not being treated fairly nor am I being afforded the same equal protection rights as a pretrial detainee. This is severely making my mental health decline.

I wrote to Director Paroli, Warden Galeon, Mrs. Reed and Mr. Matilus.

I want to get off locked status ASAP. or allow me to go to morning & afternoon yard on the block when its yard time.

Grievance # 2021-48

(1) The response was inadequate and did NOT address my issues. (2) All prisons & facilities were put on notice and are aware through legislation & law that you can NOT ~~commit~~ house mentally ill inmates in isolation in the State of Pennsylvania and prisons & facilities no longer have qualified immunity from civil suits.

#2021-48

oversight
appeal

8-15-21

- (1) The Director responded 4 months later and never once put in for an extension, so I spent 9 months unjustified on lock status with severe mental health issues and now it has gotten worse from being locked in a cell for long periods of time with no help.
- (2) This administration is using Admin lock as retaliation, punishment & torture. Furthermore its Arbitrary & Capricious because other prisoners are not ^{permitted} ~~allowed~~ to use the phones & they have stolen other inmates credentials, however, they are not on Admin lock. Once again I'm being treated differently. The investigation team needs to be fired for abuse of authority.

2021-48 appeal
B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

4-29-21

Module and Cell Number

G-21

Admission Date

I would like to see CASE Manager.I need to see that staff person because would you please forward my grievance to the Director's office.

Thank You!

Alfonso Sanchez
Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

Today came back from formal arraignment
my cell was search and everything I had
documented was stolen, what day's I was
barred from shower and yard. The day the
investigator's told me to drop the lawsuit
how many times I was sent to RHC & MHC
even just cell moves. Even copies of green slips
that I wrote but never got back.

B.C.P. Number

21-446-GS

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

7-29-21

Module and Cell Number

G-3

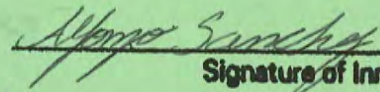
Admission Date

I would like to see

Investigator's office

I need to see that staff person because

is this some kind of joke or ill intent to put me back on lock up? why am I being put back on BHE status under investigation.



Signature of Inmate

Do Not Write Below This Line

Date request answered: 08/02/2021

Answer: MR. SANCHEZ, THE INVESTIGATION CONCERNED YOU MAKING CALLS ON OTHER INMATES' ACCOUNTS. THIS IS ANOTHER INSTITUTIONAL VIOLATION THAT YOU HAVE ENGAGED IN.

Referral Sent To:

Return To: SANCHEZ

Module & Cell #

G3

Signature of Staff Person

DISANDRO - INVESTIGATIONS

RETURN TO:
I/M SANCHEZ #095098
G-3

~~Investigator's Office~~

Investigator's Office

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Alfonzo Sanchez

Date

9-28-21

Module and Cell Number

C-43

Admission Date

I would like to see

Mr. Hunt

I need to see that staff person because

would you please contact Mrs. Reed and ask her why she told you I couldn't call my lawyer, because Mr. Kratz told my Judge I could call my lawyer.


 Signature of Inmate
Do Not Write Below This Line

Date request answered:

Answer:

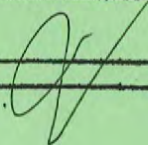
She is looking into this.

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person



Request Slip

TO: Mr. Reed

8-23-21

From: Alfonso Sanchez # 095098 G-3

Issue: I have been on RHU status since 7-26-21 without a misconduct. I was told it was because I used another inmates credentials for the phone, with that being said 1.) the infraction doesn't even hold a 30 day sentence. I feel this is a clear abuse of the investigators to hold me on lock status and this needs to stop because clearly I'm being treated differently than any other inmate. Would you please explain to me why.

I thank You!

Alfonso Sanchez

Response:

I'll check with the investigators regarding your status.

m

Sanchez

Request Slip

Request Slip

M.B. Reed

M.B. Reed

Response:

I'll check with the investigators
regarding you above.

2/2/22

Request Slip

From:

8-29-21

Alfonzo Sanchez # 095098 - G-3

TO:

Ms. Reed

Request:

You told me to write when my status was changed, it has changed, however I'm on admin lock. Would you please find out when I can get off this status because I still haven't received a misconduct.

Thank You!

Alfonzo Sanchez

Response:

You are due for your review
shortly so I will be in touch.

N.

Request Slip
Mr. Reed

Request Slip
Mr. Reed

Sandhu
G3

Thank you for your review
I will be in touch
~

Exhibit 2C

DA's

Emergency
Motion

IN THE COURT OF COMMON PLEAS OF BUCKS COUNTY
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA : CP-09-CR-0003008-2021

(Handwritten signature)

V. :

ALFONSO SANCHEZ : ATTORNEY I.D. # 69706

ORDER

AND NOW, this day of , 2021, upon consideration of the
attached Motion, it is hereby **ORDERED** that unsecured bail is granted on this case only
with the following condition:

1. The defendant may have no contact with other incarcerated offenders.

BY THE COURT:

J.

IN THE COURT OF COMMON PLEAS OF BUCKS COUNTY
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA : CP-09-CR-0003008-2021

V. :

ALFONSO SANCHEZ :

ATTORNEY I.D. # 69706

**EMERGENCY MOTION TO MODIFY BAIL AND IMPOSE NEW BAIL
CONDITIONS**

TO THE HONORABLE JUDGE RUBENSTEIN:

AND NOW, the Commonwealth of Pennsylvania, by its attorneys, Matthew D. Weintraub, District Attorney of Bucks County, Matthew S. Lannetti, Deputy District Attorney of Bucks County, and Edward J. Furman, Assistant District Attorney of Bucks County, respectfully represents the following:

1. On CP-09-CR-0001136-2008, the Defendant, Alfonso Sanchez, is charged with two counts of Criminal Homicide, one count of Attempted Criminal Homicide, and related offenses for killing two individuals and shooting and injuring a third in 2007.
2. On CP-09-CR-0003007-2021 the Defendant is charged with multiple counts Solicitation to Commit Criminal Homicide, Intimidation of a Witness, and related charges stemming from attempts to have a witness in the underlying homicide case (1136-2008) killed.
3. On Criminal Information CP-09-CR-0003008-2021 the defendant is charged with Contraband, Corrupt Organizations, and related charges for organizing and running a suboxone ring within the Bucks County

RECEIVED
2021 JUL -6 A 8:48
CLERK OF COURT

48

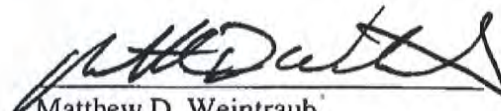
Correctional Facility.

4. The defendant had been in administrative segregation but is now in general population.
5. The defendant, in committing these offenses, has demonstrated that he will not conform his conduct to comply with the laws of the Commonwealth or the rules and regulations of the Bucks County Correctional Facility even while he is incarcerated.
6. The Commonwealth has learned that the Department of Corrections has determined that the defendant does not pose a present danger to the institution and has placed him into general population from administrative segregation.
7. The Commonwealth avers that the defendant poses a present danger to not only the prisoners and staff within the Correctional Facility, but also to the general public, because he solicited multiple individuals to murder a witness in his homicide case. The Commonwealth avers that both the individuals at the Correctional Facility and the public at large will be in danger for as long as the defendant remains housed in general population.
8. While the defendant had been separated from other inmates while housed in administrative segregation there had been no drug smuggling, threats, or attempts to murder witnesses in pending court cases by the defendant.
9. The Court cannot specifically order that a defendant be placed in administrative segregation. See Dial v. Vaughn, 733 A.2d 1 (Pa. Commw. LEXIS 432) (1999).
10. However, a general condition of any bail is that a defendant refrain from criminal activity. Pa. R. Crim. Pro. 526.

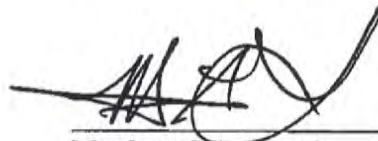
11. Further, the Court does have the authority to set necessary conditions of release on bail, including any conditions necessary to ensure that the defendant refrain from criminal activity. Pa. R. Crim. Pro. 527.
12. The Commonwealth acknowledges that this bail motion will create a “fiction” because the defendant’s capital case will prevent him from actually being released.
13. By requesting that the Court grant this bail modification, the Commonwealth is seeking a legal means to ensure that the public remains safe and protected from the defendant while he awaits trial on his capital murder case, the case in which he solicited the murder of a witness in his capital murder case, and the case in which he operated a drug smuggling ring inside the correctional facility.
14. As such, the Commonwealth respectfully asks this Court to order the following, solely to ensure that the defendant continues to refrain from criminal activity while incarcerated.
 - a. Reduce the defendant’s bail in CP-09-CR-0003008-2021 to an unsecured bail so that he will be released on that case **only**, while remaining incarcerated on his other cases.
 - b. Set the following non-monetary condition of release on CP-09-CR-0003008-2021 to ensure that the defendant refrains from committing criminal conduct.
 - i. The defendant may have no contact with other incarcerated offenders.

WHEREFORE, the Commonwealth respectfully requests that the above bail motion be granted.

Respectfully submitted,



Matthew D. Weintraub
District Attorney



Matthew S. Lannetti
Deputy District Attorney



Edward J. Furman
Assistant District Attorney

COMMONWEALTH OF PENNSYLVANIA :

: SS.

COUNTY OF BUCKS :

Matthew S. Lannetti, Esquire, being duly sworn according to law, deposes and says that he is a Deputy District Attorney of Bucks County and that the facts set forth in the foregoing are true and correct to the best of his knowledge, information and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. C.S.A. Subsection 4904 relating to unsworn falsification to authorities.

I further certify that the foregoing document complies with the provisions of the *Case Records Public Access Policy of the Unified Judicial System of Pennsylvania* that require filing confidential information and documents differently than non-confidential information and documents.



Matthew S. Lannetti
Deputy District Attorney

Dated: July 2, 2021

**IN THE COURT OF COMMON PLEAS OF BUCKS COUNTY
CRIMINAL DIVISION**

COMMONWEALTH OF PENNSYLVANIA : CP-09-CR-0003008-2021

V. :

ALFONSO SANCHEZ : ATTORNEY I.D. # 69706

PROOF OF SERVICE

I hereby certify that I served a copy of the foregoing document upon the persons
and in the manner indicated below:

SERVICE BY HAND DELIVERY:

Clerk of Courts
100 N. Main St.
Doylestown, PA 18901

The Honorable Alan M. Rubenstein
Judge's Chambers
100 N. Main St.
Doylestown, PA 18901

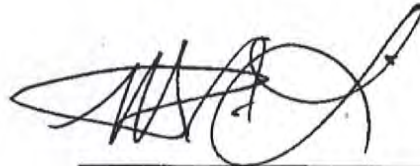
SERVICE BY FIRST CLASS MAIL:

Francis Genovese, Esq.
3881 Skippack Pike
PO Box 1368
Skippack, PA 19474

Niels Eriksen, Jr., Esq.
174 Middletown Blvd. #300
Langhorne, PA 19047

Mark Eastburn, Esq.
60 E. Court St. PO 1389
Doylestown, PA 18901

Dated: July 2, 2021

A handwritten signature in black ink, appearing to read 'Matthew S. Lannetti', written over a horizontal line.

Matthew S. Lannetti
Deputy District Attorney
Attorney ID No. 314391
Office of the District Attorney
Bucks County Courthouse, 2nd Fl.
100 N. Main St.
Doylestown, PA 18901
(215) 340-8018

Exhibit 2D
Letter From
Oversight
Board



County of Bucks

PRISON OVERSIGHT BOARD

Administration Building

55 East Court Street, Doylestown, PA 18901

(215) 348-6435 Fax (215) 348-5216

County Commissioners

Diane M. Ellis-Marseglia, LCSW, *Chair*

Robert J. Harvie Jr., *Vice Chair*

Gene DiGirolamo

August 30, 2021

Alfonso Sanchez
#095098
Bucks County Correctional Facility
1730 S. Easton Road
Doylestown, PA 18901

RE: Grievance #2021/48

Dear Mr. Sanchez:

I am in receipt of the above-captioned grievance which was filed on April 20, 2021. This same grievance was received by the Prison Oversight Board on August 25, 2021, as a third level grievance regarding your status on administrative lock. It is my understanding that you were released from custody on July 2, 2021, in response to this grievance, with no phone or tablet privileges. I have also learned that you were returned to administrative lock on July 26, 2021, because of another misconduct allegation. Because you were released in response to this grievance, it appears that this grievance is moot and it is therefore denied.

Very truly yours,

Ann P. Russavage-Faust
Chief Public Defender

APR-F:dm

Exhibit 2 E

BCCF Request Slip

Re Atty Calls

From Dep. Warden Ms. Reed

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Alfonzo Sanchez

Date

9-28-21

Module and Cell Number

C-43

Admission Date

I would like to see

Mr. Huff

I need to see that staff person because

would you please contact Mrs. Reed and ask her why she told you I couldn't call my lawyer, because Mr. Kratz told my Judge I could call my lawyer.

Alfonzo Sanchez
Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

I was wrong. Sorry for the confusion.

you will be permitted to contact your

Referral Sent To:

attorney through CM Huff. He was advised &

Return To:

Module & Cell #

Signature of Staff Person

will coordinate.

u

Exhibit 3

Injuries

Exhibit 3 Complaint Question V

Injuries

Please see attached BCCF green sheets requesting medical treatment and equipment; Medical requests submitted to Prime Care through BCCF dispensary; and, 12/13/20 Grievance and incorporate these submissions and content by reference. These documents were submitted in real time and document Plaintiff's injuries to his foot (broken toe; plantar fasciitis; nerve damage) and the numerous requests for treatment and equipment which went unheeded because of placement in admin seg and restricted housing. It is almost impossible to calculate the extent of the damage as BCCF refuses to allow any kind of examination by specialist or imaging

Mental Health

Plaintiff has suffered severe symptoms similar to the effects of other inmates who have spent extended time in isolation. His symptoms, ~~are~~ in the past have included thoughts of self-harm, hearing voices; banging head off the walls; seeing things; chronic insomnia. Plaintiff has consistently notified BCCF administration and mental health staff of these problems caused by the extended period of isolation. Nearly the entirety of treatment provided for these issues and his severe anxiety are only addressed through random

Question V Continued
~~Mental Health (continued)~~

consultations through ~~a~~^{his} door. Sanchez' severe anxiety and the worsening of his underlying mental health issues have a direct connection to his placement in the isolation which is a critical part of administrative segregation.

As demonstrated in the Emergency Motion filed by the DA, their intent is to exacerbate Sanchez' isolation by keeping him away from contact with all other inmates.

Exhibit 3A

Part IV

BCCF Request Slips

Re: Injury

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

12-4-20

Module and Cell Number

RHU 9

Admission Date

I would like to see

Director of Nursing.

I need to see that staff person because

I went to medical today after wait over a week about my Plantar Faciitis and a broken toe, and I also told the nurse about my nerve damage on my left foot as well due to me stepping on a 3 inch piece of glass. I used to take 600mg 3 times a day of Norco for the nerve pain. Well the nurse only gave me motrin which does not work or help at all, she didn't even wrap my toe or give me crutches. And for my plantar Faciitis I'm willing to have my family order and pay for my own ortho sneakers if you approve me to have them sent in. Would you please make the aforementioned happen for me?

Thank You!

Alfonso Sanchez
Signature of Inmate

Do Not Write Below This Line

Date request answered:

12-10-20 1900

Answer: Crutches are not allowed on a restricted unit. You also can't have toe wrapped, long bandages can be used for self injury. Tasked provider with request for orthotic shoes.

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

MM LPN

12-11-20

Director of Nursen

Director of Nursen

RHU-9B

12-13-20

Grievance

- (1) I broke my middle toe on a metal loop sticking up from the ~~Bed~~ of the bed. It's been about 3 weeks and I'm being refuse crutches. & for my toe to be wrap with something to keep my toe set. (2) I also have Planter Faciitis to which is causing severe pain in both feet and I need to order orthotic shoes. (3) I have ~~been~~ nerve damage on my left as well (and I used to) take something called Nervoten 600 mg 3x a day. due to a 3 inch piece of glass going through my foot.

(4)

I wrote sick call on ~~12-13-20~~ another on 12-1-20 then I was seen on 12-4-20 and ^{I was} refused treatment and only given motrin for 5 days. Then I wrote a green slip to Director of Nursing. and still I was refused treatment.

- (1) I ^{would like} ~~want~~ my toe wrap so it could heal properly. with crutches. (2) I ^{would like} ~~want~~ to be approved to order orthotic shoes, I'll even have ^{pay and} my family send them in. (3) I would like to be proscribed Nervoten for the nerve pain cause thats the only medication that worked good. (4) The metal loops need to be removed from the bed to prevent from other people getting hurt.

12-4-20

D.B.N. Director of Nurses

I went to medical today about my plantar Faciitis and a broken toe. And also told the nurse about my nerve damage on my left foot as well due to me stepping on a 3 inch piece of glass. I used to take meroten for the nerve pain. Well the nurse only gave me motrin which does not help at all, she didn't even wrap my toe or give me crutches. And as for the plantar Faciitis I'm willing to have my family pay for my own ortho sneakers if you approve me to order them. Can you please make the aforementioned happen for me.

Write to Linda Ogden RN & J. Thomas RN/cn Supervisor on 1-13-21 about the refusal of sneakers on 1-12-21



Webster Law^{PC}
CRIMINAL DEFENSE

Sara M. Webster, Esquire
87 North Broad Street
Doylestown, PA 18901
swebster@websterlawpa.com

March 8, 2021

Alfonso Sanchez
Inmate No. 095098
1730 S. Easton Road
Doylestown, PA 18901

Dear Mr. Sanchez;

I am in receipt of your most recent letter dated 1/25/2021 which was responded to by the acting warden and the Superintendent and appealed to the Prison Oversight Board on 2/28/2021. You have grieved the refusal of the prison to accept "orthotic" sneakers bought by your family. You claimed that other inmates have been permitted similar sneakers.

Having spoken with the staff at the prison I have confirmed that Air Jordan sneakers are not orthotic and were therefore properly rejected. What you are permitted to have brought in are just the inserts for the orthotic support and not the sneakers. Therefore, the resolution by the Prison Oversight Board is that the grievance was properly denied in that the sneakers proposed do not qualify as orthotic.

Very truly yours,

SARA WEBSTER

c.c.: Kim Doran via email to ksdoran@buckscounty.org

095098

MEDICAL PROVISION FROM HOME

INMATE'S
NAME:

Sanchez, Alfonso

DATE: 12/29/2020

ITEM(S) NEEDED

DEVICE:

orthopedic shoes

MEDICATION:

APPROVALS

NURSE (filling out form)

NURSING SUPERVISOR

DEPUTY WARDEN - PROGRAMS

Linda Q. Jones
J. Thomas Carlson
for DW head

***LOBBY OFFICER PLEASE ATTACH FORM TO ITEM WHEN RECEIVED AND RETURN TO DISPENSARY**

OFFICER'S SIGNATURE: _____ DATE: _____

ITEM DISPENSED TO INMATE

RECEIVED BY: _____

DATE: _____

*Speakers denied not orthopedic.
Placed in property. UN 1-12-21*

Name: SANCHEZ, ALFONSO
 Location: MAIN
 Property: All Property For An Inmate
 Date: 01/13/2021 11:20

Booking #	BCP #	Commitment Date	Current Housing
2017002359	095098	04/25/17 09:34	BCCF-D MODULE-012

Qty	Entry Date/Time	Description	Bin Location	Disposition	Release Date/Time	Released To
1	04/25/17 09:44	SOCKS	BR 0815			
1	04/25/17 09:44	STATEOR COUNTY ISSUE	BR 0815			
1	04/25/17 09:44	UNDERWEAR	BR 0815			
1	04/25/17 09:44	RETAINS GLASSES	BR 0815			
1	04/25/17 09:44	RETAINS SNEAKERS	BR 0815			
1	01/13/21 11:17	SNEAKER TYPE PROHIBITED	BR 0815			

I have inspected the receipt and I believe it to be true and accurate property.

 Inmate Signature

 Officer Signature

Signature certifies that I have carefully inspected the entire list of property and that I have no other items in my possession. I further understand that should any of the issued items I received be damaged (other than normal use), destroyed, or missing, I may be charged the replacement costs. I further certify that I have no legal recourse against the facility upon signing this receipt.

If you choose a Prepaid Card: I hereby authorize and request the return of my funds on the Numi Prestige Prepaid Mastercard and confirm receipt of the cardholder agreement. I understand the card is active and there may be fees associated with the use of the card. Those fees are listed in the cardholder agreement. I further understand that I may choose not to use the card and can request a check be mailed to me in accordance with the terms set forth in the cardholder agreement. There is no purchase price for the prepaid card. No fee was charged for activating the card.

65

2-10-21 Appeal

There is NO set policy or catalog in medical or this facility about what shoes to order. Also there has been numerous inmates with similar sneakers that medical & this facility approved. And the insole of my sneakers are medically orthotic. This is arbitrary & medical malpractice for denying medical treatment.

PRIME CARE MEDICAL, INC.

Patient Follow-Up Sheet

Patient Name: Alfonso Sanchez Date of Birth: _____
Identification Number: 095098 Cell Location: G20

Date of Service: 1/20/21

Service Type:

☐

Lab

☒

X-Ray

☐

EKG

☐

Intake Testing

Your recent test(s) results performed by the Medical Department have been reviewed by the Medical Provider. The Provider has determined that:

☐

You have been scheduled for a follow up visit which should occur on _____

☒

The results are considered within normal ranges, no further visits are required. If you continue to have any concerns/issues please resubmit a sick call request.

Sincerely,

Medical Department

Date: 1/21/21

Medical Signature

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alonzo

Date

1-13-21

Module and Cell Number

D12 MHU 5

Admission Date

I would like to see

Linda Ogden RN

I need to see that staff person because

I was approved to have my family send in ortho sneakers. My family paid for custom sneakers with an additional ortho insert. They had them dropped off on 1-12-21 at 3:00 pm. However, I was told that a guard/co. told a nurse to refuse my sneakers because they are not orthotic. First of all, most he is not a shoe specialist or a foot doctor to have them refused. And even if I were to pay for them sneakers regularly they are still perfect for my foot condition because my family went to a foot doctor first to have them approved so I wouldn't get the wrong sneaker. I'm asking would you please contact property officer Hartman and have my sneakers brought to me. Thank You

Alonzo Sanchez

Signature of Inmate

Do Not Write Below This Line

Date request answered: 1-14-21 2200

Answer: Family brought in Nike Jordan's. They are not approved orthotic sneakers. Per Health Services Administrator.

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

MM LPN 1-15-21

MH-5

Linda Ogden RV

Linda Ogden RV

PrimeCare Medical, Inc.

— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —

NAME / NOMBRE Sanchez, Alsonzo DATE / FECHA 11-29-20

PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE 095098

DATE OF BIRTH / FECHA DE NACIMIENTO 12-29-81

(UNIT / CELL) / (UNIDAD / CELULA) RHL 9

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)

REASON FOR REQUEST / RAZÓN DE LA SOLICITUD I have plantar Faciitis
and its getting worse, would you please approve me
to have my family send me in ortho sneakers because
the ones here don't have cushion and its painful for me
to walk. Also I think I broke one of my toes, I got it
caught in a metal loop on the bed while I was asleep.

(TO BE COMPLETED BY MEDICAL STAFF) /
(PARA SER COMPLETADO POR EL PERSONAL)

DATE RECEIVED IN MEDICAL: 11/29/20 @ 2200

RESPONSE: SHOE WILL NOT BE REQUESTED
AT THIS TIME. YOU WILL BE
SEEN FOR NURSE SICK CALL.

JA, RN
(SIGNATURE)

11/29/20
(DATE)

(2nd Slip Submitted)**PrimeCare Medical, Inc.**

— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —

NAME / NOMBRE Alfonzo Sanchez DATE / FECHA 12-1-20PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE 095098DATE OF BIRTH / FECHA DE NACIMIENTO 12-29-81(UNIT / CELL) / (UNIDAD / CELULA) RHU 9

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)

REASON FOR REQUEST / RAZÓN DE LA SOLICITUD I have planter fascitis
and its getting worse, could you please approve me to have my
family order me ortho sneakers. Also I think I broke my
middle toe on the bed while I was sleeping. The bed
has large metal loops sticking up from the sides. Can
Someone please come see me or call me down, Thanks!

(TO BE COMPLETED BY MEDICAL STAFF) /
(PARA SER COMPLETADO POR EL PERSONAL)DATE RECEIVED IN MEDICAL: 12/9/20

RESPONSE:

Sick call in place -
were already told no shoe
@ this time

[Signature] 12/9/20
 (SIGNATURE) (DATE)

PrimeCare Medical, Inc.**— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —**NAME / NOMBRE Alfonso Sanchez DATE / FECHA 5-17-21PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE 095098DATE OF BIRTH / FECHA DE NACIMIENTO 12-29-81(UNIT / CELL) / (UNIDAD / CELULA) G-21

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)

REASON FOR REQUEST / RAZÓN DE LA SOLICITUD I broke my low
middle for back in Nov. of 2020, however, its
not getting better. My toe for the past 2
months has been going numb & freezing
cold and it still hurts really bad to
walk on it. Can someone come see me so I
don't have to walk down there.

(TO BE COMPLETED BY MEDICAL STAFF) /
(PARA SER COMPLETADO POR EL PERSONAL)DATE RECEIVED IN MEDICAL: 5/20/21 0090RESPONSE: Scheduled

 (SIGNATURE)

5/20/21
 (DATE) 71

PrimeCare Medical, Inc.

— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —

NAME / NOMBRE Alfonso Sanchez DATE / FECHA 5-30-21

PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE 095098

DATE OF BIRTH / FECHA DE NACIMIENTO 12-29-81

(UNIT / CELL) / (UNIDAD / CELULA) G-21

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)

REASON FOR REQUEST / RAZÓN DE LA SOLICITUD would you
please approve me for a cane due to
having a broken toe, Thank you!

(TO BE COMPLETED BY MEDICAL STAFF) /
(PARA SER COMPLETADO POR EL PERSONAL)

DATE RECEIVED IN MEDICAL: Scheduled 6/30/21

RESPONSE: _____

72

2nd Slip Submitted!

PrimeCare Medical, Inc.

— SICK CALL REQUEST / PETICIÓN DE ENFERMERIA —

NAME / NOMBRE Alfonso Sanchez DATE / FECHA 6-12-21

PATIENT NUMBER / NÚMERO DE IDENTIFICACIÓN DEL PACIENTE 095098

DATE OF BIRTH / FECHA DE NACIMIENTO 12-29-81

(UNIT / CELL) / (UNIDAD / CELULA) G-21

(TO BE COMPLETED BY PATIENT) / (PARA SER COMPLETADA POR PACIENTE)

REASON FOR REQUEST / RAZÓN DE LA SOLICITUD Welded someone

please approve me for a cane due to me having
a broken leg, also its been going numb &
and frozen cold. And Please come see me
so I don't have to walk down there.

Thank You!

(TO BE COMPLETED BY MEDICAL STAFF) /
(PARA SER COMPLETADO POR EL PERSONAL)

DATE RECEIVED IN MEDICAL: _____

RESPONSE: _____

Tablet 6/11/21

(SIGNATURE)

(DATE)

Exhibit 4

Complaint
Question

IV

Relief

Exhibit
Relief

Complaint Question VI

Plaintiff, Alfonso Sanchez, believes the evidence will demonstrate he is entitled to the following relief:

- ① Immediate transfer from administrative segregation into general population;
- ② Establishment by BCCF of a system for the transfer of pre-trial detainees into administrative segregation including written notice, an opportunity to respond and an adequate manner to determine the potential length ~~in~~ inmates can be placed into administrative segregations; and
- ③ Monetary damages for the harm to Sanchez' physical and mental health because of his placement in administrative segregation as detailed in the complaint as well as for any other harm caused by the Defendant's action in this case. As well as Nominal, compensatory, and punitive damages.

④ All defendants must be fired without their pension due to their blatant abuse/torture of Mr. Sanchez, because Mr. Sanchez don't want them ~~to~~ have the opportunity to harm another person again.

⑤ A jury trial on all issues triable by jury.

⑥ Plaintiff's cost in this suit. Any additional relief this court deems just.

⑦ Preliminary & Permanent Injunction.

To have BCCF release Mr. Sanchez into population - "General population" because of the continuing harm Mr. Sanchez suffers from isolation both mental & physical. And Mr. Sanchez is more than likely to show at trial that the defendants violated Mr. Sanchez's rights as well as Mr. Sanchez's false imprisonment.

Exhibit 5
Grievance Documents -
Question VII

Grievance Filed 8-15-21

Ms. Reed told me to file grievance on 8-12-21 about my property being stolen and or misplaced, and my glasses got broken from mishandling my property. I'm still missing (6) Turkey leg, (6) Hot Sausage, (3) Reg. Sausage, (4) white rice, (6) Sq. Cheese, (4) Tub Cheese, (1) Basketball Reebok Sneakers, (1) XL Sweatshirt, (1) 2x Sweatpants, Spanish english dictionary, (5) Books, family photo's and legal materials. Total for commissary \$ 152.46, My glasses "Derzon" Model # D0C302 200 HM cost \$2,495.00.

I spoke to LT. Bahlaj, Captain Nottingham and Ms. Reed, they told me to give them time to find my stuff, however, I was only given 3 items back. Ms. Reed told me to file grievance because it takes too long to replace my belongings.

I want to be reimbursed for everything, commissary \$ 152.46, Glasses \$ 2,495.00 and I don't know how to put a price on family photo's & legal materials. and Books, we can come to some kind of agreement.

Appeal

9-19-21

1) No commissary that's unopened ever gets discarded when going to RHU, you can look at all inmates log sheet when placed in RHU. Ask officers who work RHU.

2) I had 5 boxes of property and I only got 2 boxes out of 5, you could ask CO's Keller, Williams, Leary, ~~Gray~~ and Lopez. And upon opening one box my glasses were broken and I reported it immediately, they were not broken when I got sent to RHU. you can ^{review cam's/video's.}

3) I tried to handle this informally before I filed grievance once it could not be handle after LT. Bahraj and Captain Nottenham said they couldn't find the rest of my stuff then I filed grievance after speaking to Mrs. Reed at another attempt to handle it informally, all to no avail, and that was on 8-12-21 then I filed grievance on 8-15-21 so I'm well within the time frame to file grievance.

4) You should be time barred because you failed to respond within ten day's nor did you ask for an extention, so I should be granted relief. Some remedy is being sought.

Exhibit 6

More tactics

OF

Retaliation

10-8-21

Today on or about 7:00pm to 7:30 my friend called my friend and told her about the lawsuit I'm filing against the prison will be out in the mail by Monday, now this is a very known number Mr. Sanchez calls to which the investigators listen to and in on that number. Now no longer than 2 min about or more when call was completed Mr. Sanchez's games, music, ^{commissary,} ~~and~~ law library functions were shut down. Clearly they were shut down because of the said conversation about the lawsuit being filed and ready by Monday 11, 2021 against this facility

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)	Sanchez Alfonso	Date	8-8-21
Module and Cell Number	G-3	Admission Date	

I would like to see MS. Hunsicker Law LibraryI need to see that staff person because would you please come help me fill out a 1983 form with In Forma Pauperis and appointment of counsel.

Thank You!

Alfonso Sanchez
Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer: I can provide the form but only a legal representative can help you fill it out.

Forms Attached.

Referral Sent To: _____

Return To: _____

Module & Cell # _____

Signature of Staff Person MS. Hunsicker 8/10/21

BCCF 194 REV. 10/04

Received
8-17-21

Law Library

Mrs. Hunsicker

Mrs. Hunsicker

Law Library

63

Schultz

Request Slip

From: Alonzo Sanchez # 095098 | Date: 8-16-21

To: Ms. Hunsicker Law Library

Requesting: would you please send me case law because I'm on RHE status. Following:

Arberry v. Sizell, 586 F.2d 37

Hewitt v. Helms, 459 U.S. 460, 103 S. Ct. 864

Meachum v. Fano, 427 U.S. 215

U.S. v. Salerno, 481 U.S. 739, 747, 95

Baxter v. Palmigiano, 425 U.S. 308, 313

Also would you please send me State & Federal law on Liberty Interests.

Thank You!

Alonzo Sanchez

Attached

MS. Hunsicker

8/23/21

~~XXX~~ C-3-8

20005

Request Slip

To: MB Hensicker Law Library

Request Slip
MB Hensicker Law Library

G-3-B

~~MB~~

2/10/22

MB Hensicker

10/28/21

8/28/21

B.C.P. Number

095098

ALL INMATES FILL IN THIS SECTION

Name (Last, First)

Sanchez Alfonso

Date

2-24-21


Module and Cell Number

G 20

Admission Date

I would like to see Ms. Hunsicker

I need to see that staff person because could you please send me the guidelines for sentencing for 183902A - 183909 - 183495238A1 and the rules of criminal procedure as to these charges


 Signature of Inmate

Do Not Write Below This Line

Date request answered:

Answer:

Attached

Referral Sent To:

Return To:

Module & Cell #

Signature of Staff Person

Ms. Hunsicker

BCCF 194 REV. 10/04

 Received
 on 3-5-21

Law Library

Ms. Hansicker

Ms. Hansicker

Law Library

020

2210 MS

Joseph Foreback #079693
1730 S. Eastern Rd.
Doylstown, Pa. 18901



YVY-X
S.W.S.N

TO: U.S. District Court, EDPA.
601 Market St.
Phila, pa 19106



Purple Heart
The Medal for the
Combat Wounded

RECEIVED
OCT 28 2021

